

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

HLFIP HOLDING, INC. d/b/a SMART
COMMUNICATIONS IP HOLDINGS,

Plaintiff,

v.

YORK COUNTY, PENNSYLVANIA;
YORK COUNTY PRISON; and CLAIR
DOLL, *in his official capacity as York
County Prison Warden,*

Defendants.

Civil Action No. 1:20-CV-00186

(Judge Conner)

**DEFENDANTS' MOTION FOR JUDGMENT
ON THE PLEADINGS OF INVALIDITY UNDER 35 U.S.C. § 101**

Defendants York County, Pennsylvania; York County Prison; and Clair Doll, in his official capacity as York County Prison Warden, through their undersigned counsel, respectfully move the Court for judgment on the pleadings that the asserted claims of U.S. Patent No. 10,291,617 are invalid under 35 U.S.C. § 101. *See Alice Corp. Pty. Ltd. v. CLS Bank Int'l*, 573 U.S. 208, 220, 221 (2014). In support of this motion, Defendants submit the accompanying memorandum of law. For the reasons stated in that memorandum, Defendants request that the Court grant their motion and dismiss Plaintiff's complaint with prejudice.

Pursuant to Local Rule 7.1, counsel for Defendants certify that they have conferred with counsel for Plaintiff regarding this motion. Plaintiff opposes the relief sought in this motion.

Dated: February 10, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on February 10, 2021, a true and correct copy of the foregoing
**Defendants' Motion for Judgment on the Pleadings of Invalidity Under 35
U.S.C. § 101** was served by electronic mail on the following counsel of record:

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